

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JENIFER FRANKLIN,

Plaintiff,

v.

DYNAMIC RECOVERY SERVICES, INC.,

Defendant.

Case No.: 08-CV-2477

Judge Castillo

Magistrate Judge Cole

MOTION FOR ENLARGEMENT OF TIME
TO FILE RESPONSIVE PLEADING

Defendant, DYNAMIC RECOVERY SERVICES, INC., (“Dynamic”), by and through its attorneys DAVID M. SCHULTZ and CORINNE C. HEGGIE, and for its Motion for a 21-day Enlargement of Time to File a Responsive Pleading to Plaintiff’s Complaint states as follows:

1. Plaintiff’s Complaint purports to state claims against Dynamic for violations of the Fair Debt Collection Practices Act, Illinois Collection Agency Act and Illinois Consumer Fraud Act.

2. Dynamic was served with the Complaint on May 6, 2008, and its responsive pleading is due on May 27, 2008.

3. Defendant has retained defense counsel who have filed Appearances. Counsel for the Defendant has contacted counsel for the Plaintiff about the instant motion, and Plaintiff’s counsel does not oppose the enlargement of time sought.

4. Defendant hereby requests an additional 21 days to answer or otherwise plead. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to analyze the pleading and prepare the appropriate response to the multiple claims arising out of both state and federal law.

WHEREFORE, Defendant, DYNAMIC RECOVERY SERVICES, INC., respectfully requests that this court grant it an additional 21 days to on or before June 10, 2008 to file a responsive pleading to Plaintiff's Complaint.

Respectfully submitted,

HINSHAW & CULBERTSON LLP

By: s/ David M. Schultz
David M. Schultz

David M. Schultz
Corinne C. Heggie
Hinshaw & Culbertson LLP
222 N. LaSalle, Suite 300
Chicago, IL 60601
312-704-3000